Supporting Statement for Emergency Collection of Puerto Rico Energy Resilience Fund, Household Intake Form

Part A: Justification

OMB No. 1910-5200

Collection Instrument: PR-ERF Household Intake Form

October 2024

U.S. Department of Energy
Washington, DC 20585

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Introduction

Provide a brief introduction of the Information Collection Request. Include the purpose of this collection, note the publication of the 30-Day Federal Register Notice, and provide the list of forms within this collection.

Pursuant to the Office of Management and Budget (OMB) procedures established in 5 C.F.R. 1320, Controlling Paperwork Burdens on the Public, the U.S. Department of Energy (DOE), Grid Deployment Office (GDO), is requesting that the proposed revision of the currently-approved information collection, Puerto Rico Energy Resilience Fund (PR-ERF) Household Intake form, be processed as an Emergency Clearance Information Collection Request (ICR) as referenced in 5 C.F.R. 1320.13, Emergency Processing.

DOE has determined that the information must be collected prior to the time periods established under Part 1320 of the regulation, and that this information is essential to GDO's implementation of the Puerto Rico Energy Resilience Fund (PR-ERF).

The PR-ERF will support the installation of rooftop solar and storage solutions for vulnerable Puerto Rican households. The purpose of this ICR is to authorize the 'PR-ERF Household Intake Form' as the means to collect homeowner information necessary to qualify households as eligible to participate in the deployment phase of the PR-ERF. Eligibility is limited to very low-income single-family households[1] residing in Puerto Rico that (1) include an individual with an energy-dependent disability or (2) are located in a Last Mile Community[2]. On May 15, 2024 OMB approved form 1910-5200. GDO is seeking a revision of the current intake form.

The requested revision to the existing approved form does not change or increase the burden on the public. The revision simply provides alternative options for potential beneficiaries of the PR-ERF program to demonstrate eligibility.

List of forms within this collection:

Attachment A - PR-ERF Household Intake Form English version
Attachment B - PR-ERF Household Intake Form Spanish version

A.1. Legal Justification

Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection. Attach a copy of the appropriate section of each statute and regulation mandating or authorizing the information collection.

The Department of Energy (DOE) requires emergency approval for this collection of information to comply with its legal obligations under the Consolidated Appropriations Act of 2023, Public Law 117-328. The Consolidated Appropriations Act of 2023, Public Law 117-328,[3] directs the Department of Energy to improve the resilience of the Puerto Rican electric grid, including grants for low-and-moderate-income households and households that include individuals with disabilities for the purchase

[1] A household in which at least one individual is enrolled in or receives benefits from one or more of the following government assistance programs: Low-Income Home Energy Assistance Program (LIHEAP), Nutrition Assistance Program (NAP), or Temporary Assistance for Needy Families (TANF).

[2] Eligibility Map | CARTO Builder

[3] FY23 Summary of Appropriations Provisions.pdf, Title IV – Energy and Water Development, and Related Agencies --ENERGY AND WATER DEVELOPMENT, AND RELATED AGENCIES

and installation of renewable energy, energy storage, and other grid technologies. Specifically, DOE requires emergency approval for this collection to address the urgent need to accelerate the provision of solar PV and battery storage systems to ensure reliable electric service is available to vulnerable residents of Puerto Rico. Collection of this information is essential to the mission of DOE.

DOE has initiated installations of solar PV and battery storage systems to address the harm and risk represented by the fragility of the island's power system. However, DOE has received significant public input from program awardees and potential beneficiaries[4] to expand the types of information that may be submitted to verify eligibility under the program. Many awardees and potential beneficiaries of this program have requested DOE expand the definition "very low-income single-family household" to consider additional income qualifying programs and allow potential beneficiaries to submit this information as verification of eligibility to the program. As a result, it is necessary for DOE to modify the program information collection practices in response to this public feedback.

Failure to collect the information necessary to verify eligibility in a timely manner will cause unacceptable delays in providing assistance necessary to reestablish the reliability of electric service to these vulnerable residents. As such, public harm is reasonably likely to result in the absence of emergency approval of this request.

A.2. Needs and Uses of Data

Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Recognizing that the demographic served may lack access to broadband and have limited mobility, GDO has developed an in-person application process.

Information collection is performed by a network of fourteen Community Based Organizations (CBOs) that were selected through the competitive 'Solar Ambassador Prize.'[5] Solar Ambassadors, working on behalf of the selected CBOs, assist Puerto Rican homeowners interested in receiving rooftop solar PV and battery storage installation in completing the 'Household Intake Form.' Information collected on the Form is used to ensure applicants are eligible to participate in the deployment phase of the PR-ERF.

Sections of the Household Intake Form that require revision are:

Part A
- Question #2- Income eligibility

Part C
- Section 2- Qualifying Resident Data
- Section 3- Document Upload

Specific questions under revision are highlighted in **bold** below:

[4] This includes responses to a Request for Information on the program design issues February 21, 2023 as well through negotiations with program awardees.

[5] Puerto Rico Energy Resilience Fund | Department of Energy

Sections of Form to be completed by the homeowner/s:

Yes/No check a box format:

1. Is the home a single-family house (i.e., fully detached house, semidetached (side-by-side) house, row house, or townhouse)?
2. **Is at least one of the residents of the household enrolled in or receive benefits from one or more of the following government assistance programs: Low-Income Home Energy Assistance Program (LIHEAP), Nutrition Assistance Program (NAP), Temporary Assistance for Needy Families (TANF), Plan de Salud Vital, or USDA Section 502 or 504 Programs.**
3. Is this the primary residence of the homeowner?
4. Does at least one of the residents of the household qualify as an Individual with an Energy Dependent Disability?
5. Is the household located in a Last Mile Community (a qualifying census block that has a high percent of very low-income households, and experiences frequent and prolonged power outages)?

Data Fields:

1. Installation Physical Address
2. Mailing address
3. Name of Homeowner
4. Name of Individual with energy dependent disability (if applicable)
5. Homeowner's Phone number
6. Alternate phone number (if identified by the homeowner, someone who lives at or outside the household)
7. Homeowner's Email
8. **Name of Individual enrolled in TANF, PAN, LIHEAP, Plan de Salud Vital, USDA Programs 502/504**
9. Section 4: Homeowner's Verification of Information
10. Section 5: Ambassador Statement

Supporting Documentation to be provided:

1. **Proof of enrollment in Low-Income Home Energy Assistance Program (LIHEAP), Nutrition Assistance Program (NAP), Temporary Assistance for Needy Families (TANF), Plan de Salud Vital, or USDA Section 502 and 504 Programs**
2. **Proof of Individual with Energy Dependent Disability living in household**
3. Proof of homeownership
4. Proof of most recent electric bill

Sections of Form to be completed by the Solar Ambassador:

Yes/No check a box format:

1) Is the single dwelling house 50 years of age or older?

2) Does the house have any tall surrounding vegetation (trees) and/or large structures (buildings) that may shade the roof?
3) Roof Type (material)
4) Roof type (flat or inclined/pitched)

A.3. Use of Technology

Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology, e.g., permitting electronic submission of responses.

GDO provides a digital means for homeowners to complete the Household Intake Form. 100% of responses is collected electronically.

A.4. Efforts to Identify Duplication

Describe efforts to identify duplication.

Consultations with program offices serving low-income populations such as the Housing and Urban Development (HUD) and the State Weatherization Program (WAP) were had to determine if there was an approved ICR seeking the same information. It was determined that there are no existing ICRs that can be used or modified for our purpose.

A.5. Provisions for Reducing Burden on Small Businesses

If the collection of information impacts small businesses or other small entities, describe any methods used to minimize burden.

Neither small businesses nor other small entities are impacted.

A.6. Consequences of Less-Frequent Reporting

Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

GDO has initiated installations of solar PV and battery storage systems to address the harm and risk represented by the fragility of the island's power system. Failure to collect the information necessary to verify eligibility in a timely manner will cause delays in providing assistance necessary to reestablish the reliability of electric service to these vulnerable residents.

Puerto Rican stakeholders and the Puerto Rican public requested that education, outreach, and household verification for PR-ERF be performed by trusted community members through an in-person application process.

A.7. Compliance with 5 CFR 1320.5

Explain any special circumstances that require the collection to be conducted in a manner inconsistent with OMB guidelines: (If any)

(a) requiring respondents to report information to the agency more often than quarterly;

(b) requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;

(c) requiring respondents to submit more than an original and two copies of any document;

(d) requiring respondents to retain records, other than health, medical government contract, grant-in-aid, or tax records, for more than three years;

(e) in connection with a statistical survey, that is not designed to product valid and reliable results that can be generalized to the universe of study;

(f) requiring the use of statistical data classification that has not been reviewed and approved by OMB;

(g) that includes a pledge of confidentially that is not supported by authority established in stature of regulation, that is not supported by disclosure and data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

(h) requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.

The information collection will be conducted in a manner consistent with OMB guidelines.

A.8. Summary of Consultations Outside of the Agency

If applicable, provide a copy and identify the date and page number of publication in the Federal Register of the agency's notice, required by 5CFR 320.8(d), soliciting comments on the information collection prior to submission to OMB. Summarize public comments received in response to that notice and describe actions taken in response to the comments. Specifically address comments received on cost and hour burden. Describe efforts to consult with persons outside DOE to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or report.

GDO is seeking a revision of the current intake form, specifically the sections related to income eligibility and proof of an individual with an energy dependent disability. DOE has initiated installations of solar PV and battery storage systems to address the harm and risk represented by the fragility of the island's power system. However, DOE has received significant public input from program awardees and potential beneficiaries[6] to expand the types of information that may be submitted to verify eligibility under the program. The summary of responses from the RFI can be found in Attachment C - Beneficiary Criteria Reconsideration Request and the summary of recommendations and GDO's analysis can be found in Attachment D – Beneficiary Criteria Input.

[6] This includes responses to a Request for Information on the program design issues February 21, 2023 as well through negotiations with program awardees.

Many awardees and potential beneficiaries of this program have requested DOE expand the definition "very low-income single-family household" to consider additional income qualifying programs, such as Plan de Salud Vital and USDA Sections 502 and 504 Programs and allow potential beneficiaries to submit this information as verification of eligibility to the program. Also, awardees expressed age verification as an appropriate modality for verifying energy-dependent disability status and including temperature control devices as eligible medical equipment for energy-dependent critical load purposes. As a result, it is necessary for DOE to modify the program information collection practices in response to this public feedback.

Due to the expedited timeframe for collecting this information, DOE is requesting an Emergency Clearance as referenced in 5 CFR 1320.13, Emergency processing. GDO is submitting a 30-day FRN for publication to run concurrently with the Emergency approval, if granted.

A.9. Payments or Gifts to Respondents

Explain any decision to provide any payment or gift to respondents, other than remuneration of contractors or grantees.

No payment or gift is being provided to the respondents.

A.10. Provisions for Protection of Information

Describe any assurance of confidentiality provided to respondents and the basis for the assurance in statute, regulation, or agency policy.

Information collected on the form was developed in consultation with the DOE Privacy Program under the Office of the Chief Information Officer (OCIO) that manages the Department's compliance with and implementation of the Privacy Act of 1974, Section 208 of the e-Government Act of 2002. It was determined that this collection falls under the protection of *DOE-82: Grant and Contract Records for Research Projects, Science Education, and Related Activities.* The Form contains a Privacy Act Statement.

DOE provided privacy training to parties with access to the Form that addresses the key elements necessary for ensuring the safeguarding of personally identifiable information as prescribed by Federal Acquisition Regulation (FAR) 52.224-3 Privacy Training.[7]

A.11. Justification for Sensitive Questions

Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private. This justification should include the reasons why DOE considers the questions necessary, the specific uses to be made of the information, the explanation to be given to persons from whom the information is requested, and any steps to be taken to obtain their consent.

No questions of a sensitive nature are being asked on the form.

[7] 52.224-3 Privacy Training. | Acquisition.GOV

A.12A. Estimate of Respondent Burden Hours

Provide estimates of the hour burden of the collection of information. The statement should indicate the number of respondents, frequency of response, annual hour burden, and an explanation of how the burden was estimated. Unless directed to do so, DOE should not conduct special surveys to obtain information on which to base hour burden estimates. Consultation with a sample fewer than 10 potential respondents is desirable.

Original Solar Ambassador response estimates were based on our intent to award twenty (20) CBOs. As a result of application reviews and negotiations, GDO had selected sixteen (16) for award. Currently, there are fourteen (14) CBOs conducting outreach and intake process. Using the established estimated network of ten Ambassadors per CBO, the estimated number of Solar Ambassador respondents has decreased to 140.

Homeowner Burden Hours:

The goal is to receive responses from up to 40,000 eligible households.

Total number of Respondents: Up to 40,000 homeowner respondents.

Annual Number of Responses: Up to 40,000 responses.

Burden Hours Per Response:

We estimate it can take five minutes for the homeowner or for the Solar Ambassador to explain the PR-ERF program and describe elements of the Household Intake Form. We estimate that it will take a homeowner (respondent) ten minutes to complete contact information and basic inputs such as home address. We estimate that it will take forty minutes for a homeowner to access information that may not be readily available such as proof of homeownership, income, and/or copies of electric bills. GDO has built-in methods to reduce burden to homeowners by providing Solar Ambassadors with links to sites where information, if not readily available, can be located by the homeowner. **In total, we do not expect a homeowner to have a time burden of over 55 minutes.**

Using a homeowner time burden of fifty-five minutes multiplied by 40,000 homeowner respondents, this would equate to 36,800 hours of burden.

Solar Ambassador Burden Hours:

Total number of Respondents: Up to 140 Solar Ambassador respondents.

Annual Number of Responses: Up to 40,000 responses.

We estimate that it will take five minutes for the Solar Ambassador to engage with the homeowner and provide all relevant information regarding the program. Solar Ambassadors will be responsible for completing 'Section 6: Rooftop Solar Readiness' of the Household Intake Form. The assessment is visual in nature and process for collection is provided in a check-a-box format. **We estimate that time burden associated with homeowner engagement and information collection will not exceed 30 minutes.** We

estimate that each of the sixteen CBOs will enlist approximately no more than ten Ambassadors leading to an average total network of one-hundred and sixty Ambassador respondents.

Reporting Frequency

One time.

Table A1. Estimated Respondent Hour Burden

Form Number/Title (and/or other Collection Instrument name)	Type of Respondents	Number of Respondents	Annual Number of Responses	Burden Hours Per Response	Annual Burden Hours	Annual Reporting Frequency
Household Intake Form: Homeowner Data	Homeowner	40,000	40,000	0.921	36,800	1
Household Intake Form: Introduction/Program Overview and Solar Readiness	Solar Ambassador	140	40,000	0.5	20,000	1
TOTAL		40,140	80,000		**56,800**	

A.12B. Estimate of Annual Cost to Respondent for Burden Hours

Provide estimates of annualized cost to respondents for the hour burdens for collections of information, identifying and using appropriate wage rate categories. The cost of contracting out or paying outside parties for information collection activities should not be included here. Instead, this cost should be included under 'Annual Cost to Federal Government'.

Cost to Homeowners

The hourly minimum wage rate for Puerto Rico from the Department of Labor's (DOL) 'Consolidated Minimum Wage Table,' is $8.50.[8] As the populations we are working to serve are very low income, this rate has been applied as our benchmark. To convert the hourly rate to a fully burdened rate (i.e., wage plus benefits) a multiplier of 1.4 was applied.[9]

Fully burdened rate for Homeowners: 8.5*1.4 = $11.90

Total costs: 36,800 hours*11.9 = $437,920

Cost to Solar Ambassadors

Using wage rate data specific to Puerto Rico from the DOL BLS, Occupation Code 21-0000, Community and Social Services Occupations with the hourly wage rate of $14.56 seems most in-line with duties to

[8] Consolidated Minimum Wage Table | U.S. Department of Labor (dol.gov)
[9] http://www.bls.gov/news.release/ecec.nr0.htm

be performed by Solar Ambassadors.[10] To convert the hourly rate to a fully burdened rate (i.e., wage plus benefits) a multiplier of 1.4 for private employees was applied.

Fully burdened rate for Solar Ambassadors: 14.56*1.4 = $20.38

Total costs: 20,000 hours*20.38 = $407,600

Table A2. Estimated Respondent Cost Burden

Type of Respondents	Total Annual Burden Hours	Hourly Wage Rate	Total Respondent Costs
Homeowners	36,800	$11.90	$437,920
Solar Ambassadors	20,000	$20.38	$407,600
TOTAL	56,800		$845,520

A.13. Other Estimated Annual Cost to Respondents

Provide an estimate for the total annual cost burden to respondents or recordkeepers resulting from the collection of information.

GDO estimates that respondents will have no additional costs associated with the collection other than the burden hours and costs related to completing the Household Intake Form.

A.14. Annual Cost to the Federal Government

Provide estimates of annualized cost to the Federal government.

Third-party Verification

DOE contracted an independent third-party support contractor to perform final verification that eligibility criteria have been met. The contractor has estimated that verification activities would take four employees 7,500 hours to complete. Using national data from the DOL BLS, 'Occupation Code 3-1000, Business Operations Specialist' with an hourly wage rate of $40.04 seems most in-line with verification duties we are requesting to be performed.[11]

To convert the hourly rate to a fully burdened rate (i.e., wage plus benefits) a multiplier of 1.4 for private employees was applied.

Fully burdened rate: 40.04*1.4 = $56.06

Total costs: 7500 hours*56.06 = $420,450

TOTAL SUM OF ANNUAL COSTS TO THE FEDERAL GOVERNMENT = $420,450.

[10] 21-0000, Community and Social Services Occupations, Puerto Rico - May 2022 OEWS State Occupational Employment and Wage Estimates (bls.gov)

[11] 13-1000, Business Operations Specialist, May 2021 National Occupational Employment and Wage Estimates (bls.gov)

A.15. Reasons for Changes in Burden

Explain the reasons for any program changes or adjustments reported in Items 13 (or 14) of OMB Form 83-I.

No changes to approved burden.

A.16. Collection, Tabulation, and Publication Plans

For collections whose results will be published, outline the plans for tabulation and publication.

There are no plans for publication.

A.17. OMB Number and Expiration Date

If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

The Department is not seeking approval to not display the expiration date for OMB approval of the information collections contained in this package.

A.18. Certification Statement

Explain each exception to the certification statement identified in Item 19 of OMB Form 83-I.

There are no exceptions to the certification statement identified in item 19, "Certification for Paperwork Reduction Act submissions" of OMB form 83-I.